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VERIZON COMMUNICATIONS INC.,
VERIZON CALIFORNIA INC., VERIZON
CORPORATE SERVICES GROUP INC.,
VERIZON SERVICES CORP., TELESECTOR
RESOURCES GROUP, INC. d/b/a VERIZON
SERVICES GROUP, VERIZON SERVICES
OPERATIONS INC., VERIZON SERVICES
ORGANIZATION, INC., VERIZON
CORPORATE SERVICES CORP., and
VERIZON DATA SERVICES, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

DESIREE MOORE and KAREN JONES
individually and on behalf of a class of similarly
situated individuals,

Plaintiffs,

vs.

VERIZON COMMUNICATIONS INC.,
VERIZON CALIFORNIA, INC., VERIZON
CORPORATE SERVICES GROUP INC.,
VERIZON SERVICES CORP., TELESECTOR
RESOURCES GROUP, INC. d/b/a VERIZON
SERVICES GROUP, VERIZON SERVICES
OPERATIONS INC., VERIZON SERVICES
ORGANIZATION, INC., VERIZON
CORPORATE SERVICES CORP., VERIZON
DATA SERVICES, INC., and DOES 1 through
25,

Defendants.

CASE NO. CV 09-1823 SBA

**STIPULATION AND ~~PROPOSED~~
ORDER TO CORRECT THE
COURT'S FINAL APPROVAL
ORDER DUE TO A SCRIVNER'S
ERROR**

The Honorable Sandra B. Armstrong

WHEREAS, on February 27, 2012, Plaintiffs filed a Notice of Errata Re Plaintiffs' Motion for Preliminary Approval correcting the definition of "Aggregators" contained in the Parties' Settlement Agreement to include the Billing Resource LLC. (Dkt. Nos. 94 & 96.)

WHEREAS, on February 28, 2012, the Court entered the Preliminary Approval Order, which, *inter alia*, certified the Settlement Class and defined the class to include customers of the Billing Resource LLC (Dkt. No. 99.).

WHEREAS, millions of Bill Inserts and Email Notices were sent to Settlement Class Members identifying the Billing Resource LLC as an "Aggregator" covered by this settlement, and the Preliminary Approval Order identifying the Billing Resource LLC as an Aggregator covered by the Settlement was included on the Settlement Class Website.

WHEREAS, on August 28, 2013, the Court entered the Final Approval Order (Dkt. No. 196), which in footnote 2 thereof listed the incorrect definition of "Aggregators" that had been contained in Plaintiffs' initially filed Motion for Preliminary Approval (Dkt. No. 91) which inadvertently excluded The Billing Resource LLC from the listing.

WHEREAS, the exclusion of The Billing Resource LLC from the list of "Aggregators" enumerated in the Final Approval Order appears to have been an inadvertent scrivener's error.

NOW THEREFORE, the parties, by their undersigned counsel, hereby stipulate, subject to the approval of the Court, as follows:

1. Footnote two on page five of the August 28, 2013 Final Approval Order (Dkt. No. 196) should be corrected to state:

The Settlement Agreement defines "Third Party Charge" as "a charge from a Third- Party Service Provider billed by Verizon to the Settlement Class through an "Aggregator." (Settlement Agreement at 9.) The term "Third-Party Service Provider(s)" is defined as "any Person whose charges were billed by Verizon to the Settlement Class through an Aggregator." (*Id.*) The term "Aggregators" is defined as "Billing Concepts, Inc. a/k/a Billing Services Group Clearing Solutions or BSG d/b/a USBI and ZPDI, ACI Billing Services Inc. d/b/a OAN, Enhanced Services Billing, Inc. d/b/a ESBI, and HBS Billing Services Company (collectively, 'Billing

Concepts Inc.'), The Billing Resource d/b/a Integretel, The Billing Resource LLC (collectively, 'The Billing Resource'), ILD Teleservices, Inc., ('ILD'), Transaction Clearing, LLC ('Transaction Clearing') and PaymentOne Corp., d/b/a PaymentOne or Ebillit ('Payment One') or any of them." Id. at 2.

2. The correction of this scrivener's error is *nunc pro tunc* and shall not have any effect on the Effective Date of the Class Settlement, nor shall it have any effect on the date of the Judgment entered by this Court on October 30, 2013 (Dkt. No. 208) nor the time for appealing such Judgment.

Respectfully submitted,

Dated: February 6, 2014

MUNGER, TOLLES & OLSON LLP

Henry Weissmann
Rosemarie T. Ring

By: /s/ Zachary M. Briers
Zachary M. Briers

Attorneys for Defendants

Dated: February 6, 2014

JACOBS KOLTON, CHTD

John G. Jacobs
Bryan G. Kolton

By: /s/ John G. Jacobs
John G. Jacobs

Attorneys for the Settlement Class

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED:

1. Footnote two on page five of the Court's August 28, 2013 Final Approval Order (Dkt. No. 196) is corrected to state:

The Settlement Agreement defines "Third Party Charge" as "a charge from a Third- Party Service Provider billed by Verizon to the Settlement Class through an "Aggregator." Settlement Agreement at 9. The term "Third-Party Service Provider(s)" is defined as "any Person whose charges were billed by Verizon to the Settlement Class through an Aggregator." *Id.* The term "Aggregators" is defined as "Billing Concepts, Inc. a/k/a Billing Services Group Clearing Solutions or BSG d/b/a USBI and ZPDI, ACI Billing Services Inc. d/b/a OAN, Enhanced Services Billing, Inc. d/b/a ESBI, and HBS Billing Services Company (collectively, 'Billing Concepts Inc.'), The Billing Resource d/b/a Integretel, The Billing Resource LLC (collectively, 'The Billing Resource'), ILD Teleservices, Inc., ('ILD'), Transaction Clearing, LLC ('Transaction Clearing') and PaymentOne Corp., d/b/a PaymentOne or Ebillit ('Payment One') or any of them." *Id.* at 2.

2. The correction of this scrivener's error is *nunc pro tunc* and shall not have any effect on the Effective Date of the Class Settlement, nor shall it have any effect on the date of the Judgment entered by this Court on October 30, 2013 (Dkt. No. 208) nor the time for appealing such Judgment.

Dated: February 6, 2014


SAUNDRA B. ARMSTRONG
United States District Judge

Filer's Attestation

I, Zachary M. Briers, am the ECF user whose identification and password are being used to file this JOINT ADMINISTRATIVE MOTION TO CORRECT THE COURT'S FINAL APPROVAL ORDER DUE TO A SCRIVENER'S ERROR. In compliance with General Order 45.X.B, I hereby attest that the other above-named signatories concur in this filing.

Date: February 6, 2014

By: /s/ Zachary M. Briers
Zachary M. Briers